Case 4:22-md-03047-YGR Document 2262-2 Filed 09/16/25

Page 1 of 3

[PROPOSED] ORDER GRANTING MOTION TO INTERVENE

Proposed Intervenor Time USA, LLC's Motion to Intervene for the Limited Purpose of Protecting Access to Court records came on for a hearing before this Court on October 21, 2025, at 2:00 p.m. The Court, having considered the parties pleadings, the arguments of counsel, and the entire records in this case, **GRANTS** Time's motion. The Court will allow Time's limited participation in the sealing procedure as outlined below and will consider any briefing that Time may file in omnibus motions on sealing disputes. Accordingly, the Court hereby **AMENDS** the order setting sealing procedures, Dkt. 341, as follows:¹

Section I.B.1. is amended to read: "The filing party shall serve all documents to be sealed upon all parties, including Intervenor, and on any designating third party whose confidential information is included. The filing party need not serve unredacted versions of documents to be sealed on Intervenor, so long as it has complied with the procedures in Section I.A. of this Order, including publicly filing all nonconfidential and partially redacted items associated with the Primary Entry as attachments to the Temporary Sealing Motion."

Section I.B.2. is amended to read: "Within 10 calendar days of receiving service, each designating party or third party shall communicate with the filing party and Intervenor regarding the sealing designations made."

Section I.B.2(b) is amended to read: "If the designating party believes a document may be filed with redactions (rather than entirely under seal) or with fewer redactions, the designating party shall provide the filing party with a redacted version of the document for filing. The designating party shall also promptly provide the redacted version of the document to Intervenor. The filing party will then be responsible for providing the document to the Court in accordance with Section II."

Section I.B.2(c) is amended to read: "If the designating party determines that the document is not entitled to protection, the designating party shall provide the filing party with a version of

¹ The plain text in the paragraphs that follow is original language that appears in the order setting sealing procedures at Dkt. 341. Amended language is identified in red text. All amendments add language to the existing order; there are no other edits or deletions.

1 the document with the confidentiality designations removed for filing. The designating party shall 2 also promptly provide the document with confidentiality designations removed to Intervenor." Section I.B.2(d) is added to read: "The designating party or third party's communications 3 4 with Intervenor regarding sealing designations shall include discussion of the asserted bases of confidentiality and general descriptions of the nature and content of the documents at issue 5 sufficient to provide Intervenor with an understanding of the asserted basis for sealing. However, 6 designating parties need not reveal the specific content of any privileged or confidential 7 information itself in explaining their positions to Intervenor." 8 9 Section II.A.2(a) is amended to read: "Each party, including Intervenor, may file one motion addressing all disputed documents and information. Each motion shall be no longer than 5 10 pages unless leave from the Court is granted.⁵ Motions shall be accompanied by appropriate 11 declarations." 12 Section II.A.3. is amended to read: "Within 5 business days of the motions being filed, 13 14 each party, including Intervenor, may file one opposition, of no more than 5 pages, unless leave is 15 granted per the procedures identified above, in response to the sealing motions." 16 IT IS SO ORDERED. 17 DATED: , 2025 18 19 20 The Honorable Judge Yvonne Gonzalez Rogers 21 22 23 24 25 26 27 28 Case No. 4:22-md-03047-YGR

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